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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION**

ALEJANDRO FLORES, ET AL.,

## Plaintiffs,

V.

Civil Action No:  
1:22-cv-01003-JLT-HBK

DR. LORI BENNETT, ET AL.,

### Defendants.

**THIRD STIPULATED MOTION FOR  
EXTENSION OF THE DEADLINE FOR  
THE JOINT STATUS REPORT**

## **STIPULATION**

IT IS HEREBY STIPULATED by the parties through their respective counsel of record as follows:

WHEREAS, on June 1, 2023, this Court stayed the proceedings of this case pending the resolution of Defendants appeal to the Ninth Circuit. ECF No. 54.

WHEREAS, the Court requested that the parties file a joint status report within thirty days of the issuance of the Ninth Circuit's mandate. ECF No. 54.

WHEREAS, the Ninth Circuit's mandate issued on August 25, 2023.

WHEREAS, on September 21, 2023, the Court granted the parties' First Stipulated Motion for an Extension of the Deadline for the Joint Status Report. ECF No. 58.

1           WHEREAS, on December 12, 2023, the Court granted the parties' Second Stipulated  
2 Motion for an Extension of the Deadline for the Joint Status Report. ECF No. 60.

3           WHEREAS, the parties' joint status report is now due on January 26, 2024. ECF No. 60.

4           WHEREAS, the parties remain actively engaged in settlement negotiations which would  
5 eliminate the need for additional motion practice or discovery. In addition, the parties have  
6 agreed to conduct a half-day mediation on April 2, 2024 which they believe will allow them to  
7 reach a final agreement.

8           NOW THEREFORE, the parties hereby request that the Court extend the January 26  
9 deadline for the joint status report set in ECF No. 60 by 90 days, to be due on April 25, 2024.  
10

11 Dated: January 25, 2024

12 FOUNDATION FOR INDIVIDUAL  
13 RIGHTS AND EXPRESSION

14 By: /s/Daniel M. Ortner

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1 Dated: January 25, 2024

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3 By: /s/Anthony Demaria

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